



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

MRM:ED'A  
F. #2024R00494

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 5, 2025

By ECF

The Honorable Eric R. Komitee  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Andrew Simpson, et al.  
Criminal No. 24-360 (EK)

Dear Judge Komitee:

The government respectfully submits this letter to inform the Court that earlier today a Magistrate Judge of this Court authorized a complaint charging defendant Devone Thomas with possession of prison contraband for conduct occurring on February 28, 2025. See United States v. Devone Thomas, 25-MJ-71 (EDNY). A copy of the complaint is attached as Exhibit 1.

The government has notified defense counsel Lisa Scolari, Esq. and learned counsel Thomas Ambrosio, Esq. of these new charge in advance of the filing of this letter.

Respectfully submitted,

JOHN J. DURHAM  
United States Attorney

By: /s/  
Elizabeth D'Antonio  
Assistant U.S. Attorney  
(718) 254-4131

cc: Lisa Scolari, Esq. (by ECF)  
Thomas Ambrosio, Esq. (by ECF)  
Kenneth Womble, Esq. (by ECF)  
Nathan Chambers, Esq. (by ECF)

## EXHIBIT 1

NEM:ED'A  
F. #2025R00R00161

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

- against -

DEVONE THOMAS,

Defendant.

COMPLAINT AND  
AFFIDAVIT IN SUPPORT  
OF ARREST WARRANT

(18 U.S.C. § 1791(a)(2))

Case No. 25-MJ-71

----- X

EASTERN DISTRICT OF NEW YORK, SS:

DANIELLE WILLIAMS, being duly sworn, deposes and states that she is a Special Agent with the United States Attorney's Office, Eastern District of New York, duly appointed according to law and acting as such.

On or about February 28, 2025, within the Eastern District of New York and elsewhere, the defendant DEVONE THOMAS, while an inmate of a prison, to wit: the Metropolitan Detention Center in Brooklyn, New York, did knowingly and intentionally possess and obtain a prohibited object intended to be used as a weapon, to wit: a white blade.

(Title 18, United States Code, Section 1791(a)(2))

The source of your deponent's information and the grounds for her belief are as follows:<sup>1</sup>

---

<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Special Agent with the United States Attorney's Office for the Eastern District of New York and have been involved in the investigation of contraband possession, assault and other crimes occurring at the Metropolitan Detention Center ("MDC"). I am familiar with the facts and circumstances set forth below from, among other things, conversations with witnesses, observation of physical evidence and my review of MDC records in the investigative file.

2. The MDC is an administrative security metropolitan detention center located in Brooklyn, New York. It primarily houses defendants detained prior to their trial on federal criminal charges filed in the United States District Court for the Eastern District of New York and the United States District Court for the Southern District of New York, although inmates from other districts may also be housed at the MDC for various reasons. Currently, approximately 1,200 defendants are incarcerated at the MDC.

3. On or about February 20, 2024, the defendant THOMAS was charged by complaint with two counts of Hobbs Act Robbery, in violation of 18 U.S.C. § 1951 and two counts of using a firearm in furtherance of a crime of violence, in violation of 18 U.S.C. § 924(c). See United States v. Thomas, 24-CR-157, ECF No. 1 (DLC) (S.D.N.Y.). Thereafter, a grand jury sitting in the Southern District of New York returned an indictment charging THOMAS with Hobbs Act Robbery conspiracy and four counts of Hobbs Act Robbery, in violation of 18 U.S.C. § 1951 and four counts of using a firearm in furtherance of a crime of violence, in violation of 18 U.S.C. § 924(c). Id., ECF No. 8. After initially being released on bail, on or about March 22, 2024, THOMAS' bail was revoked and he was ordered detained pending trial. Id., ECF No. 16.

4. The Federal Bureau of Prisons (“BOP”) designated THOMAS to be detained at the MDC pending trial.

5. On or about September 9, 2024, THOMAS was charged with the murder in a federal detention facility of Uriel Whyte, in violation 18 U.S.C. § 1111, assault in federal detention facility, in violation of 18 U.S.C. § 113(a)(6), obstruction of justice, in violation of 18 U.S.C. § 1512(c)(1) and possessing contraband in prison, in violation of 18 U.S.C. § 1791. See United States v. Thomas, 24-CR-360, ECF No. 1 (EK) (E.D.N.Y.) (“Thomas II”).

6. On or about February 28, 2025, THOMAS had a status hearing before the Honorable Eric R. Komitee in Thomas II at the United States District Court for the Eastern District of New York, in Brooklyn, New York. When THOMAS returned from court to the MDC, correctional officials confronted THOMAS about whether he was in possession of a weapon, and THOMAS produced the white blade depicted in Figure 1 from his groin area.



*Figure 1, white blade*

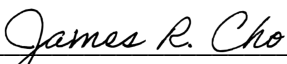
WHEREFORE, your deponent respectfully requests that the defendant DEVONE THOMAS, be dealt with according to law.

/s/ Danielle Williams

---

DANIELLE WILLIAMS  
Special Agent, United States Attorney's Office,  
Eastern District of New York

Sworn to before me this  
5<sup>th</sup> day of March, 2025 by telephone

  
\_\_\_\_\_  
THE HONORABLE JAMES R. CHO  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK